

ORIGINAL
3: CV 03 1616
CIVIL RIGHTS ACT, 42 U.S.C.A. § 1983

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IN THE UNITED STATES -
DISTRICT, COURT OF THE
MIDDLE DISTRICT OF -
PENNSYLVANIA

WILLIAM VICTOR

PLAINTIFF

VS.

THE MONROE COUNTY CORRECTIONAL FACILITY, THE STATE OF PENNSYLVANIA, MONROE COUNTY PUBLIC DEFENDERS ALONG WITH INSURANCE COMPANIES OF ALL ABOVE DEFENDANTS INCLUDED BUT NOT LIMITED TO MEDICAL, DENTAL AND MENTAL HEALTH CARE OF AND AT MONROE COUNTY CORRECTIONAL FACILITY AS WELL AS BELOW - LISTED DEFENDANTS RESPONSIBILITY OF CARE, CUSTODY AND CONTROL OF ME WHILE BEING HOUSED AT SAID FACILITY AS A PRE-TRIAL & POST TRIAL PRISONER: CORRECTIONAL OFFICER'S WILLIAMS, SOFIA, WEBER, BETH, BENTACORT, GONZALEZ, SANTIAGO, BELL, JOYNES, STARNER, PALMER, HINTON, KOONCE, BURGOS, AND CARTER. SARGENTS FOSTER, DAUGHERTY AND KENNEDY. LIEUTENANT'S MCCOY, LUDWIG AND SHANNON. WARDEN OF MONROE COUNTY - DAVID G. KEENHOLD AND SUBORDINATES, DEPUTY WARDENS TABERY AND JENNINGS. CAPTAIN SLASHINSKI. MENTAL

HEALTH EMPLOYEE EISENHOWER. DENTAL DEPT./STAFF AT MON
ROE COUNTY CORRECTIONAL FACILITY. MEDICAL DEPT. OF THE
SAME ABOVE FACILITY AND EMPLOYEES, NURSE'S BECKY, ESTER,
VALENTINE, MONACO AND DR. SHAW. CLASSIFICATION COUN-
SELOR GARY MCFARLAND. ANY AND ALL ENTITY/AGENCIES
PROVIDING INSURANCE FOR ANY SINGULAR OR GROUP OF
ABOVE NAME DEFENDANTS. PUBLIC DEFENDER ROBIN A. SPI-
SHOCK. DEFENDANTS.

PLAINTIFF HAS MADE A GOOD FAITH EFFORT TO
GET FULL NAMES OF DEFENDANTS UTILIZING THE
FACILITY GRIEVANCE SYSTEM AT MONROE & EX-
HAUSTED SAID FORMAT BUT DENIED FULL NAMES
AND KNOW ONLY LAST NAMES & FACES.

I. PREVIOUS LAWSUITS

A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR
FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED
IN THIS ACTION OR OTHER WISE RELATING TO YOUR IMPRI-
SONMENT? YES (NO)

II. PLACE OF PRESENT CONFINEMENT:

C. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION? (YES) NO

DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THE STATE PRISONER GRIEVANCE PROCEDURE?
(YES) NO

IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

I FILED GRIEVANCE AND REPLY'S WERE TO DENY MY RELIEF.

2. WHAT WERE THE RESULTS?

I FILED APPEALS AND EXHAUSTED ISSUE AND MANY OF THE COMPLAINTS WERE SOME HOW MISSING & NOT REPLIED TO AT START AND FINISH LEVELS.

III. PARTIES

A. NAME OF PLAINTIFF WILLIAM VICTOR

ADDRESS _____

B. DEFENDANT DAVID G. KEENHOLD.

IS EMPLOYED AS WARDEN

AT MONROE COUNTY CORRECTIONAL FACILITY -

4250 MAJOR DR., STROUDSBURG, PA 16360

C. ADDITIONAL DEFENDANTS: DEP. WARDEN TABERY

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OF 15 "NAME OF DEFENDANTS:

- WARDEN TABERY, JENNINGS, CAPTAIN SLASHINSKY. LIEUTENANT'S LUDWIG, MCCOY AND SHANNON. SARGENTS - FOSTER, DAUGHERTY AND KENNEDY. CLASSIFICATION COUNSELOR GARY MCFARLAND. CORRECTIONAL OFFICER'S - WILLIAMS, SOFIA, WEBER, BRILL, BENTACORT, GONZALEZ, SANTIAGO, BELL, JOYNES, STARNER, PALMER, HINTON, KOONCE, BURGOS AND CARTER. MEDICAL STAFF, NURSES ESTER, BECKY, MONACO, VALENTINE AND DR. SHAW. DENTAL STAFF AND MENTAL HEALTH STAFF, DR. EISENHOWER. ALL EMPLOYED THEN AT MONROE COUNTY CORRECTIONAL FACILITY. ALL INSURANCE COMPANIES COVERING EACH ABOVE NAME DEFENDANTS INCLUDING THE STATE OF PENNSYLVANIA AND ITS INSURANCE AGENCY. DAVID G. KEENHOLD (WARDEN), ROBIN SPISHOCK OF THE PUBLIC DEFENDER'S OFFICE AND THE PUBLIC DEFENDERS OFFICE OF MONROE COUNTY.

STATEMENT OF CLAIM: ^{#1} ON NOV. 15TH 2001 PLAINTIFF WAS ATTACKED BY ANOTHER INMATE IN B-9 CELL AT THE MONROE COUNTY CORRECTIONAL FACILITY, INJURIES TO HEAD & BACK RESULTED. THE SAME INMATE ATTACKED ME APPROX. 3-MONTHS LATER WITH FECE & I WAS FORCED TO CLEAN IT UP. STAFF KNEW OF THE THREAT ON BOTH OCCASIONS. CONT →

IV. STATEMENT OF CLAIM: PG. 2

ON OCTOBER 5TH, 2001. I, WILLIAM VICTOR D.O.B. 9-6-70, SOCIAL SECURITY NUMBER 119-62-6633 WAS ADMITTED TO THE MONROE COUNTY CORRECTIONAL FACILITY AWAITING TRIAL AND WHILE HOUSED THERE, WAS DENIED ADEQUATE MEDICAL CARE BY NURSES VALENTINE, BECKY, MONACO, ESTER AND DR. SHAW FROM INJURIES INCURRED BY STAFF AND INMATE ASSAULTS UP UNTIL JUNE 30TH 2003. SOME OF THE DEPRIVED TREATING - WAS DELIBERATE AND THE DATES OF SOME OF THESE CLAIMS OCCURED BUT NOT LIMITED TO 11-15-01, 9-29-02, 9-30-02, 1-6-03, 3-10-03 AND 6-19-03. AM 6 PM.

#2.

ON SEPTEMBER 29TH 2002, WHILE HOUSED AT MONROE COUNTY JAIL RHU 7 CELL, CO'S KOONCE, BRILL, BELL AND WILLIAMS USED EXCESSIVE FORCE ON ME WHILE NO RESISTANCE CAME FROM ME TO JUSTIFY AND INCIDENT WAS TAPED AND ON FILE. CAUSING INJURY TO HEAD, FACE AND WRISTS. APPROX. 5:30 PM

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3. ON SEPTEMBER 30TH 2002, WHILE HOUSED AT MONROE COUNTY JAIL RHU 7 CELL, CO'S KOONCE, BRILL, BELL AND WILLIAMS USED EXCESSIVE FORCE ON ME WHILE NO RESISTANCE CAME FROM ME TO JUSTIFY AND INCIDENT WAS ALSO VIDEOTAPED AND ON FILE. CAUSING PAIN TO FACE, HEAD AND WRISTS. APPROX. 5:30 PM. PG. 5 OF 15 CONT. →

#4. PLAINTIFF SUFFERED FACE, HEAD, AND BODY INJURY ON JANUARY, 6TH 2003, CO'S USED EXCESSIVE FORCE ON PLAINTIFF WHILE HOUSED IN RHU 2 CELL AT MONROE COUNTY JAIL AS PLAINTIFF WAS IN CUFFS AND LEG IRONS AND THOSE CO'S WERE CO. WILLIAMS, BRILL, WEBER AND SOFIA AND THIS INCIDENT WAS VIDEO TAPED AND ON FILE. CAUSING INJURY TO LEFT ANKLE AND KNEE. MEDICAL ATTENTION DENIED. 6:00 PM.

#5. ON MARCH, 10TH 2003 CO PALMER ASSAULTED ME WITH CLOSED FISTS APPROX. 20 TIMES WHILE I WAS HOUSED IN RHU 8 CELL AT THE MONROE COUNTY JAIL. CAUSING INJURY AND SWELLING OF HEAD. 10:30 AM.

#6. ON JUNE, 19TH 2003 CO'S BELL JOYNES AND STAR-
NER ASSAULTED ME PHYSICALLY WHILE I WAS HOUSED IN B-UNIT 10 CELL AT THE MONROE COUNTY JAIL. CAUSING PAIN TO HEAD. APPROX. 7:30 PM.

#7. SARGENTS FOSTER, DAUGHERTY AND KENNEDY WERE PRESENT DURING ONE OR MORE OF THESE ATTACKS AND FAILED TO SUPERVISE AND OR STOP THE ASSAULTS.

#8. WARDEN KEENHOLD, DEPUTY WARDENS TABERY AND JENNINGS ALONG WITH ALL SARGENTS, LIEUTENANTS, CLASSIFICATION COUNSELOR GARY MCFARLAND AND ALL CORRECTION OFFICER DEFENDANTS IN THIS CASE PLAYED A ROLE IN DEPRIVING ME OF MY RIGHT TO FILE

A GRIEVANCE AND ABUSED THIER AUTHORITY TO TEAR UP COMPLAINTS, CAUSE COMPLAINTS TO VANISH AND OR USE DISCRIMINATORY LANGUAGE TO DENY MY COMPLAINTS, NOT LIMITED TO CO'S SANTIAGO (1-6-03) & CHRISTMAN & BETANCORT.

9. MENTAL HEALTH TREATMENT DENIED BY DR. EISENHOWER OF THE MENTAL HEALTH DEPT. AT MONROE CORRECTIONAL JAIL ON OR ABOUT DEC. 2001 AND FEB. 2002 AND MARCH, APRIL AND MAY 2003 BY REFUSING TO SEE ME DESPITE NUMEROUS REQUESTS TO DO SO BY PLAINTIFF. ALSO ON JANUARY, 6TH 2003 CO. WILLIAMS SEXUALLY HARASSED ME PULLING MY UNDERWEAR DOWN TO SEE ME.

10. CLASSIFICATION COUNSELOR GARY MCFARLAND - ABUSED HIS AUTHORITY EXCUSING DR. EISENHOWER'S BEHAVIOR RELATING DIRECTLY TO MY DENIED MENTAL HEALTH TREATMENT.

11. SGT. DAUGHERTY, CAPTAIN SLASHINSKI AND WARDEN DAVID KEENHOLD ALL ABUSED AUTHORITY TO DISCRIMINATE AGAINST PLAINTIFF'S VISITING STATUS AND FAMILY VISITS. EACH WEDNESDAY 7-9 PM.

12. WARDEN, DEPUTY WARDENS OF MONROE COUNTY JAIL DID ABUSE AUTHORITY, ALLOWING STAFF TO VIOLATE MY DUE PROCESS RIGHTS AT DISCIPLINARY HEARING'S

PG. 8 OF 15 AND TO ALLOW SUBORDINATE'S, WHICH IS ALL CORRECTION OFFICER'S AND SARGENTS NAMED IN THIS CASE TO DEPRIVE PLAINTIFF SHEETS, BLANKETS AND CLOTHING IN CELL AND FOR COLD WEATHER EXERCISE PERIODS. DEF. SPISHOCK ON 4-15-02 DID VIA "TV 13 AND TOWN'S NEWSPAPER MADE VIOLATIONS OF MY RIGHT TO A FAIR TRIAL #13.

NURSE BECKY, OFFICER BURGOS, CONTROL STAFF OUTSIDE OF A, B, RHU AND INTAKE AT MONROE COUNTY JAIL AS WELL AS CO KOOCE DID IGNORE CLEAR EVIDENCE THAT AN INMATE HOUSED IN B-UNIT 7 CELL ATTACK ME IN B-UNIT 9 CELL WHILE BEING EXAMINED BY NURSE BECKY WITH NO CO PRESENT WITH NURSE AS POLICY DICTATES AND CO BURGOS ALLOWED THIS SAME INMATE WHO ATTACKED ME ON 11-15-01 ATTACK ME AGAIN ON OR ABOUT JAN. 02 AT MONROE COUNTY JAIL B-UNIT 6 CELL. SGT. KENNEDY MADE ME CLEAN LARGE AMOUNTS OF FECEs SAID INMATE USED TO ATTACK ME THE SECOND TIME. THESE 2 ATTACKS COMMITTED AS THIS INMATE WAS UNDER SPECIAL SECURITY STATUS TO NEVER BE ALLOWED OUT WITH ME OR ANY OTHER INMATE AS THIS INMATE WHO ATTACKED ME TWICE, KILLED HIS ROOM MATE OR WAS IN SAME UNIT WITH THE INMATE HE KILLED.

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#14. ROBIN A. SPISHOCK OF THE PUBLIC DEFENDER'S OFFICE IN MONROE COUNTY DID VIOLATE MY RIGHTS BY SEEKING OUT MEDIA ON 4-15-02 AND MAKING DEVASTATING COMMENTS ABOUT ME TO TV 13 & TO POCONO RECORD NEWSPAPERS ABOUT PLAINTIFF BEING THE WORST HUMAN BEING SHE EVER REPRESENTED IN HER CAREER AND DID SO AT COURTHOUSE OF MONROE COUNTY AFTER A HEARING TO DISCUSS THE CASE. HER COMMENTS VIOLATED MY RIGHTS, RIGHT TO FAIR TRIAL & WAS LIBEL & SLANDER. DEFAMATION OF CHARACTER AND VIOLATED HER OWN ETHICS TO WIT: RULE 3.6 "TRIAL PUBLICITY".

#15. ALL DEFENDANTS LISTED HERE IN DID VIOLATE MY RIGHTS TO ADDRESS WRONG, AND DID SO WHILE I WAS HOUSED AT THE MONROE COUNTY CORRECTIONAL FACILITY OFF AND ON FROM 10-5-01 UNTIL 6-30-03 AND DID SO VIOLATE UNDER COLOR OF LAW. MONROE COUNTY CORRECTIONAL FACILITY IS NEGLIGENT, RECKLESS AND CARELESS IN THESE CLAIMS WITHOUT ANY FAULT ON THE PART OF THE PLAINTIFF CONTRIBUTING THERETO. SAID DEFENDANTS CAUSED THESE ACTIONS VIA INPROPER HIRING, RETAINING UNFIT, UNSUITED AND UNQUALIFIED INDIVIDUALS.

STATEMENT OF CLAIM: PG. 4

RELIEF:

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STATE BRIEFLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENTS. CITE NO CASES OR STATUTES.

I, WILLIAM VICTOR, STATE #FK7293 REQUEST DEFENDANTS BE SERVED WITH A COPY OF COMPLAINT AND ORDERED TO REPLY IN APPLICABLE TIME & A JURY TRIAL CONVENED TO HEAR THE FACTS OF THIS CASE AND AWARD PLAINTIFF EIGHTY TWO POINT ELEVEN MILLION DOLLARS FOR DAMAGES, PAST AND PRESENT PAIN AND SUFFERING AND EMOTIONAL DISTRESS. FUTURE PAIN, SUFFERING AND EMOTIONAL DISTRESS. PLAINTIFF RESPECTFULLY ASKS FOR THE APPOINTMENT OF COUNSEL TO ASSIST IN THE EXECUTION OF THIS CASE AND ALL LEGAL ASPECTS. TO GRANT PROCESS OF THE COMPLAINT TO BE SERVED ON ALL PARTIES BY U.S. MARSHALL'S SERVICE.

SIGNED THIS 8TH DAY OF SEPTEMBER
2003

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THE MONROE COUNTY CORRECTIONAL FACILITY, THE STATE OF PENNSYLVANIA, MONROE COUNTY PUBLIC DEFENDER'S OFFICE, ROBIN SPISHOCK (PUBLIC DEFENDER), THE REMAINING DEFENDANTS ARE AND OR STILL EMPLOYED AT THE MONROE COUNTY CORRECTIONAL FACILITY AND ARE: DEPUTY WARDEN JENNINGS, CAPTAIN SLASHINSKI, LIEUTENANTS MCCOY, LUDWIG AND SHANNON. SARGENTS FOSTER, DAUGHERTY AND KENNEDY. CORRECTIONAL OFFICERS WILLIAMS, SOFIA, WEBER, BRILL, BETANCORT, GONZALEZ, SANTIAGO, BELL, JOYNES, STARNER, PALMER, HINTON, KODNCE, BURGOS, AND CARTER. MENTAL HEALTH EMPLOYEE EISENHOWER, DENTAL STAFF AT MONROE COUNTY CORRECTIONAL FACILITY. MEDICAL DEPT. EMPLOYEES OF MONROE COUNTY CORRECTIONAL FACILITY TO WIT: NURSES BECKY, ESTER, VALENTINE AND MONACO AND DR. SHAW. CLASSIFICATION COUNSELOR GARY MCFARLAND. ALONG WITH EACH INSURANCE PROVIDER FOR EACH DEFENDANT.

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NORTHUMBERLAND COUNTY PRISON

39 NORTH SECOND STREET
SUNBURY, PA 17801



(SIGNATURE OF PLAINTIFF)

EXECUTED AT NORTHUMBERLAND COUNTY PRISON - 39

NORTH SECOND ST. - SUNBURY, PA 17801

I DECLARE UNDER PENALTY OF PERJURY THAT THE
FOREGOING IS TRUE AND CORRECT.

EXECUTED ON 9-8-03

DATE

WILLIAM VECTOR - PRESENTLY AT

NORTHUMBERLAND COUNTY PRISON

39 NORTH SECOND ST. SUNBURY, PA
17801



SIGNATURE OF PLAINTIFF

TO: CLERK OF COURT, MIDDLE DISTRICT - SCRANTON, PA 18501-1148

FROM: MR. WILLIAM VICTOR - NORTHUMBERLAND COUNTY PRISON - PLAINTIFF

RE: IDENTITY OF DEFENDANTS IN ENCLOSED CIVIL RIGHTS ACTION.

Dear SIR/MADAM, **3: 03 1616**

ENCLOSED IS A CIVIL RIGHTS ACTION I SEEK TO FILE FROM SITUATIONS THAT OCCURED AT MONROE COUNTY CORRECTIONS. THE FULL NAMES OF MOST OF THESE DEFENDANTS I TRIED TO GET FROM WARDEN KEENHOLD & DENIED BUT HAVE LAST NAMES & SHIFTS THEY WORKED ON AS OF 6-30-03. CO'S WILLIAMS, BRILL, WEBER, SOFIA, BENTACORT, GONZALEZ, SANTIAGO, JOYNES, STARNER, KOONCE & CARTER ALL WORKED 5PM TO 12:30 AM. CO'S BELL, PALMER & HINSTON WORKED 8AM - 5PM SHIFT. SARGEANTS FOSTER (8-5PM) DAUGH-ERTY (5PM TO 12:30 AM, SGT. KENNEDY (12:30 AM TO 8AM. LIEUT ENANTS MCCOY & SHANNON (5 PM TO 12:30 AM & LT. LUDWIG (8AM TO 5PM SHIFT. ALL REMAINING DEFENDANTS VARY. I ASK THAT MY SUIT BE FILED & DEFENDANTS SERVED, I HAVE NO MONEY TO DO SO NOR TO COPY FOR SERVICE. SAID COPIES WERE DENIED ME BY CURRENT FACILITY DESPITE ASKING & HAVING NO FUNDS. I CANT FIGHT THIS CASE & ASK FOR AN ATTORNEY IF OR IF NOT I AM DEEMED TO HAVE STATED A VALID CLAIM. I HAVE EXHAUSTED ALL STATED CLAIMS.

RESPECTFULLY,



